RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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6 August 1997

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Final Phase III Remedial Investigation
Site 07 - Calf Pasture Point
Navy Response to 27 June 1997 RIDEM Comments
NCBC Davisville, Rhode Island
Submitted 18 July 1997, Dated 18 July 1997

Dear Mr. Otis;

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the above referenced responses. With respect to the response to the original Comment 13 RIDEM still maintains that geologic information under Allen Harbor is necessary to the completion of the Phase III RI for this site.

As noted in our 25 June 1997 letter to you regarding the Addendum to the Sites 03 and 09 Phase III RI Work Plan, the VOC plume has not been fully delineated along the southwestern and western boundaries which represent the shores of Allen Harbor and the Allen Harbor channel, respectively. Shallow groundwater discharges into both the Harbor and channel. In addition, deep groundwater has the potential to discharge to the Harbor as well as the channel. With respect to shallow groundwater, well MW07-21S has 1481 ug/l of VOC and is a few feet north of the inlet channel. Wells MW07-21D (the western most well) and MW07-25R have high levels of VOC (8390 and 4400 ug/l, respectively).

While studies indicate at this time no ecological or human health risk (provided groundwater is not used for human consumption or inhalation of steam from showering activities) the plume is not stagnate as it has moved over 1000 feet from the probable source area. Prior to RIDEM concurring that the RI for Calf Pasture Point is complete the entire extent of the plume would have to be delineated. This can best be accomplished by advancing borings to bedrock in Allen Harbor with VOC sampling at various intervals in the approximate locations delineated in our 25 June 1997 letter to you.

In addition to delineating the plume from Calf Pasture Point, the geologic and chemical information can also be used to locate monitoring wells as part of the Long Term Monitoring Plan (LTMP) proposed by the Navy for the remedial alternative for this site. This information

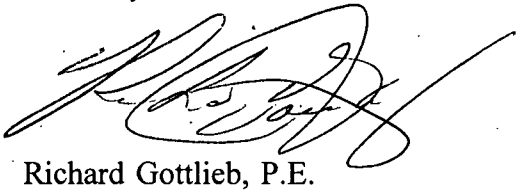
will allow us to more intelligently select monitoring locations where possible upwelling of contaminates (VOC) could occur, particularly in the near shore sediments.

In addition to the above, borings within Allen Harbor can also be used to better understand the groundwater flow from Allen Harbor Landfill should monitoring of that site show groundwater contamination.

RIDEM is suggesting these actions at this time in an effort to save the Navy and taxpayers valuable resources. As you are aware, the Navy will have a barge in Allen Harbor shortly to take borings in the harbor for the purpose of obtaining geological information for the design of the revetment for Allen Harbor Landfill. Since the Navy has indicated that mobilization costs for this type of investigation are quite high we can avoid paying twice for the mobilization costs by combining the revetment work with the additional borings that RIDEM is requesting for Calf Pasture Point and Allen Harbor Landfill into one operation. By doing so we will be gaining the information we need to fully delineate the plume from Calf Pasture Point as well as obtaining the information for the revetment design, plus obtaining information which may become useful for groundwater flow under Allen Harbor Landfill without incurring mobilization costs twice. Therefore, we need to resolve this issue as quickly as possible to take advantage of the situation at hand.

RIDEM looks forward to working with the Navy and EPA to resolve the Phase III RI. If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,



Richard Gottlieb, P.E.
Principal Sanitary Engineer

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